

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11069 (CTG)  
(Jointly Administered)

Hearing Date: To Be Determined<sup>2</sup>  
Objection Deadline: To Be Determined

**NOTICE OF MOTION OF AFCO CREDIT CORPORATION FOR AN ORDER  
GRANTING RELIEF FROM THE AUTOMATIC STAY PURSUANT TO  
11 U.S.C. § 362(d) AND BANKRUPTCY RULE 4001(a)**

**PLEASE TAKE NOTICE** that on September 14, 2023, AFCO Credit Corporation (“AFCO”), by and through its undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware the *Motion of AFCO Credit Corporation for an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and Bankruptcy Rule 4001(a)* (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on a **date to be determined** before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Courtroom No. 7, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that you are required to file a response (and the supporting documentation required by Local Rule 4001-1(d)) to the Motion on or before a **date to**

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> Contemporaneous with the filing of the Motion, AFCO also filed its *Motion for an Order Shortening Notice and Scheduling an Expedited Hearing Pursuant to Del. Bankr. L.R. 9006-1(e) Regarding Its Motion for an Order Granting Relief From the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and Bankruptcy Rule 4001(a)*.

**be determined** with the Clerk of the United States Bankruptcy Court for the District of Delaware, Marine Midland Plaza, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response so as to be received by that time by AFCO's counsel, Mark Eckard, Esquire; Reed Smith LLP; 1201 North Market Street, Suite 1500; Wilmington, Delaware 19801; E-mail: meckard@reedsmith.com.

**PLEASE TAKE FURTHER NOTICE** that the attorneys for the parties shall confer with respect to the issues raised by the Motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OF HEARING.**

Dated: September 14, 2023  
Wilmington, Delaware

Respectfully submitted,

**REED SMITH LLP**

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